

EXHIBIT L

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

Case No. 3:17-cv-00939-WHA

WAYMO LLC,)
Plaintiff,)
)
v.)
)
UBER TECHNOLOGIES, INC.;)
OTTOMOTTO LLC;)
OTTO TRUCKING,)
Defendants.)

HIGHLY CONFIDENTIAL, ATTORNEYS' EYES ONLY

VIDEOTAPED DEPOSITION OF
JAKE NOCON

DATE TAKEN: DECEMBER 19, 2017

REPORTED BY:
PAUL J. FREDERICKSON, CCR, CSR
JOB NO. 2771324

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1 Did this happen outside the United 09:57:36
2 States? 09:57:38

3 A. No, it did not. 09:57:39

4 Q. Okay. 09:57:39

5 So in terms of any human 09:57:40
6 surveillance that you performed, that was 09:57:41
7 exclusively within the United States? 09:57:43

8 A. Yes. 09:57:47

9 Q. Did you ever perform any 09:57:48
10 surveillance of any individuals who worked for 09:57:57
11 Waymo? 09:57:59

12 A. I never surveilled any individuals 09:58:06
13 that worked for Waymo. 09:58:06

14 Q. What types of surveillance did you 09:58:08
15 do on Waymo? 09:58:10

16 A. Our team was tasked with 09:58:16
17 conducting observations of Waymo's vehicles 09:58:17
18 from public places, but it was not specific to 09:58:19
19 any individual. 09:58:22

20 Q. Focusing on -- on that, who gave 09:58:34
21 you the instructions for any of the 09:58:44
22 surveillances that you did on Waymo? 09:58:47

23 A. If I recall correctly, it was Nick 09:58:50
24 Gicinto. 09:58:53

25 Q. And how many separate surveillance 09:58:53

C E R T I F I C A T E

I, PAUL J. FREDERICKSON, CA
Certified Shorthand Reporter No. 13164 and
WA Certified Court Reporter No. 2419, do
hereby certify:

That prior to being examined,
the witness named in the foregoing
deposition was by me duly sworn or affirmed
to testify to the truth, the whole truth and
nothing but the truth;

That said deposition was taken
down by me in shorthand at the time and
place therein named, and thereafter reduced
to print by means of computer-aided
transcription; and the same is a true,
correct and complete transcript of said
proceedings.

I further certify that I am not
interested in the outcome of the action.

Witness my hand this 20th day
of December 2017.



PAUL J. FREDERICKSON, CCR, CSR

WA CCR 2419 CA CSR 13164

Expiration date: March 31, 2018